BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

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)
Postal Rate and Fee Changes, 1997   )
)   **Docket No. R97-1**
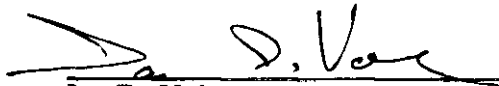_____   )

FIRST SET OF INTERROGATORIES OF THE ADVERTISING MAIL MARKETING ASSOCIATION TO USPS WITNESS SMITH (AMMA/USPS-T-45-1-2)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Advertising

Mail Marketing Association hereby propounds the attached interrogatories and requests for the

production of documents. The instructions contained in our interrogatories to Witness Moéller

(AMMA/USPS-T-36-1-3) are incorporated by reference.

If you are unable to provide any of the requested documents or information as to any of

the interrogatories, please provide an explanation for each instance in which documents or

information cannot be or have not been provided. If the witness to whom this request is

directed cannot respond, but another witness can, please redirect the request to that witness.

                    Respectfully submitted,

                    Ian D. Volner
                    N. Frank Wiggins
                    Counsel to Advertising Mail Marketing
                    Association

AMMA/USPS-T-45-1

The following questions refer to LR-H-128, page II-2 (Bates No. 21).

a. Please confirm that the 80% DBCS share on line 14 of page II-2 is derived by the method shown in the table below:

Equipment Type (1)	Number[1] of Units (2)	Relative[1] Productivity (3)	Capacity [Col (2) * Col (3)] (4)	Share [Line of Col. (3) % Line 3 of Col. (3)] (5)
1. DBCS	4,723	3	14,169	79.18%
2. CSBCS	3,726	1	3,726	20.82%
3. Total	xxx	xxx	17,895	100.00%

[1] *Source: LR-H-128 Page II-2 Footnote 2.*

b. If you cannot confirm part a, please show the derivation of the 80% DBCS share.

c. USPS Witness Daniel (USPS-T-29 Appendix I page 43 of 43 revised 10/01/97) presents the productivities shown in Column 2 of the following table:

Equipment Type (1)	Productivity (pieces/hour) (2)	Relative[1] Productivity (3)
1. DBCS	7,467	0.436
2. CSBCS	17,124	1

[1] Relative to CSBCS (Column (2) %0 17,124).

Please explain why the relative productivity in the above table is 0.436 unit of DBCS to one unit of CSBCS and that Footnote 2 of page II-2 of LR-H-128 assumes a relative productivity of a DBCS is 3.0 to one unit of productivity of CSBCS.

d. Please explain in words and diagrams the meaning of line 4 of page II-2 (% MPBCS/DBCS DESTINATING) and how it is computed. (Please define any acronyms used.)

e. Please explain in words and diagrams the meaning of line 8 of page II-2 (%

DPSGIVEN BCS 3D DESTINATION) and how it is computed. (Please define any acronyms used.)

f. Please confirm that line 13 of page II-2 is derived by the multiplication of lines 4, 8 and 14 of page II-2.

g. If you cannot confirm part f, please explain the derivation of line 13.

h. Please explain the logic of the computation that produces line 13 (% NON-ELIGIBLE AUTO CAR.ROUTE DESTINATING) and explain the meaning of the result.

i. Please provide the standard errors of the estimates shown under column headings STANDARD REG.NON-CRT, PR and STANDARD, REG CARRIER ROUTE.

j. Please explain the difference between line 13 (% NON-ELIGIBLE AUTO CAR.ROUTE DESTINATING) and line 20 (% CURRENT NON-ELIGIBLE AUTO.CAR.ROUTE DEST.).

AMMA/USPS-T-45-2

Please provide the standard errors for each estimate shown on page II-1 (Bates No. 20).

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of

record in this proceeding in accordance with section 12 of the rules of practice.

DATE: October 30, 1997

Ian D. Volner